

September 29, 1999

Mr. John Hendry
Oxford Environmental
43 Route 46 East, Suite 702
Pine Brook, New Jersey 07058

ENT

Re: Cornell-Dubilier Electronics Site, Administrative Order II-CERCLA-97-0109

Dear Mr. Hendry:

The U.S. Environmental Protection Agency (EPA) hereby notifies DSC of Newark Enterprises, Inc. that the work required by Administrative Order on Consent for Removal Action, Index Number II-CERCLA-97-0109 (Order) has not been fully carried out and that additional removal actions are required to protect public health, welfare or the environment. The following additional work is required:

1. Establish vegetative cover in unvegetated, unpaved areas of site including unvegetated areas located in the vicinity of the northeast fence line of the former driving school.
2. Repair drainage controls located down gradient of unvegetated areas and maintain these controls until such time as permanent vegetative cover is established.
3. Remove and dispose of accumulated waste stored in fenced area.

Within 15 days of receipt of this notice the respondent shall submit for approval by EPA a Work Plan describing the actions to be taken to accomplish the additional work specified. The plan shall conform with the applicable requirements of sections VII and VIII of the Order. The respondent shall implement the EPA-approved Work Plan and modify the Site Summary Report (SSR) in accordance with this notice.

The following deficiencies in SSR submitted are to be addressed in the modified report:

1. Present the results of the sampling and analysis conducted to comply with the terms of the order, including: a) samples collected from the Able Metro parking area; b) samples collected from drums removed from the site for treatment and disposal; and c) samples collected to verify spill cleanup (see item 4, below).
2. Include references to and attach copies of waste profiles and manifests for wastes removed from site for treatment and disposal.
3. Section 2.9 of the SSR indicates that 3 inches of topsoil were applied and seeded to established permanent vegetative cover and control soil erosion in unpaved areas. Five inches of topsoil were specified for application in the SOP. Include a discussion of the

reason for and implications of this deviation from the EPA-approved SOP.

4. Include a discussion of the spill that occurred on August 29, 1997 including relevant information regarding the material spilled, details of spill cleanup and verification sampling. Also include a discussion of workers exposed as a result of this spill and medical treatment received.
5. Section 2.6 of the SSR states that warning signs were posted every 100 feet along fence lines. Include a discussion regarding the posting of warning signs along property boundaries where fencing was not installed.
6. Include in Table 1 the address, telephone and contact information for Tiger Construction and Collucci Paving.

If you have any questions regarding this letter please call me at (732) 906-6991.

Sincerely,

Eric Wilson
On-Scene Coordinator

cc: L. Coraci
M. Caulfield, Esq.
M. Sundram, EPA
P. Mannino, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837

October 8, 1999

By Facsimile and U.S. Mail

Mr. John Hendry
Oxford Environmental
43 Route 46 East, Suite 702
Pine Brook, New Jersey 07058

ENF.

Re: Cornell-Dubilier Electronics Site, Administrative Order II-CERCLA-97-0109

Dear Mr. Hendry:

The U.S. Environmental Protection Agency (EPA) hereby notifies DSC of Newark Enterprises, Inc. (DSC) that the work required by Administrative Order, Index Number II-CERCLA-97-0109 (Order) has not been fully carried out and that additional removal actions are required to protect public health, welfare or the environment. The following additional work is required:

1. Characterize, remove and dispose of accumulated waste stored in fenced area formerly used by the driving school.
2. Establish vegetative cover in unvegetated, unpaved areas of site including unvegetated areas located in the vicinity of the lot formerly used by the driving school.
3. Repair drainage controls located down gradient of unvegetated areas and maintain these controls until such time as permanent vegetative cover is established.

Within 15 days of receipt of this notice DSC shall submit for approval by EPA a Work Plan describing the actions to be taken to accomplish the additional work specified. The plan shall conform with the applicable requirements of sections VII and VIII of the Order. DSC shall implement the EPA-approved Work Plan and modify the Site Summary Report (SSR) in accordance with this notice.

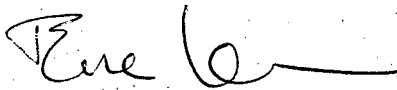
The following deficiencies in SSR submitted are to be addressed in the modified report:

1. Present the results of the sampling and analysis conducted to comply with the terms of the order, including: a) samples collected from the Able Metro parking area; b) samples collected from drums removed from the site for treatment and disposal; and c) samples collected to verify spill cleanup (see item 4, below).
2. Include references to and attach copies of waste profiles and manifests for wastes removed from site for treatment and disposal.

3. Section 2.9 of the SSR indicates that 3 inches of topsoil were applied and seeded to established permanent vegetative cover and control soil erosion in unpaved areas. Five inches of topsoil were specified for application in the SOP. Include a discussion of the reason for and implications of this deviation from the EPA-approved SOP.
4. Include a discussion of the spill that occurred on August 29, 1997 including relevant information regarding the material spilled, details of spill cleanup and verification sampling. Also include a discussion of workers exposed as a result of this spill and medical treatment received.
5. Section 2.6 of the SSR states that warning signs were posted every 100 feet along fence lines. Include a discussion regarding the posting of warning signs along property boundaries where fencing was not installed.
6. Include in Table 1 the address, telephone and contact information for Tiger Construction and Collucci Paving.

If you have any questions regarding this letter please call me at (732) 906-6991.

Sincerely,



Eric Wilson
On-Scene Coordinator

cc: L. Coraci, DSC
- M. Caulfield, Esq.
M. Sundram, EPA
P. Mannino, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

November 19, 1999

By Facsimile and U.S. Mail

Mr. John Hendry
Oxford Environmental
43 Route 46 East, Suite 702
Pine Brook, New Jersey 07058

EMF

Re: Cornell-Dubilier Electronics Site, Administrative Order II-CERCLA-97-0109

Dear Mr. Hendry:

On October 8, 1999, the U.S. Environmental Protection Agency (EPA) notified DSC of Newark Enterprises, Inc. (DSC) that the work required by Administrative Order, Index Number II-CERCLA-97-0109 (Order) had not been fully carried out and that additional removal actions were required to protect public health, welfare or the environment. The actions required included the following: characterizing and disposing of accumulated waste stored in the fenced area formerly used by the truck driving school; establishing vegetative cover in unvegetated, unpaved areas of site and repairing and maintaining drainage controls located down gradient of the unvegetated areas. EPA requested DSC to submit plan for the above work by October 25, 1999. Since then DSC's attorney orally informed EPA's counsel that you were no longer DSC's contractor for the above work. *Afterwards*, Tim Francisco of your office informed me that Oxford was talking to DSC about doing the work and that Oxford would contact me if it received DSC's approval.

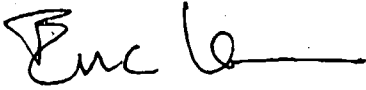
To this date, neither Oxford nor any other contractor, on behalf of DSC, has submitted any Work Plan and/or Schedule for doing the work requested by EPA. Therefore, EPA has now developed the Work Plan and the Work Schedule. A copy of the Work Plan and the Schedule is attached herewith.

EPA wishes to give an opportunity to DSC to carry out the Work according to the Plan and the Schedule attached herewith. If DSC and/or Oxford is still interested in doing the work using its own contractors, you must notify me immediately, but in no event later than by 12:00 noon, Monday November 22, 1999.

If I do not receive a response from DSC/Oxford in WRITING indicating its willingness to undertake the Work according to the Schedule attached herewith, EPA will furnish its own contractors and proceed with the Work immediately without further notice to DSC/Oxford.

If you have any questions, I can be reached at (315) 473-0083. A copy of your written response, if any, should be sent to EPA's counsel at his Fax Number 212-637-3096.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Wilson", with a long horizontal stroke extending to the right.

Eric Wilson
On-Scene Coordinator

enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

**Work Plan and Work Schedule for Site Stabilization Removal Action
Cornell-Dubilier Electronics Site
South Plainfield, New Jersey**

Work Plan

- 1 Provide personnel, equipment, materials and services necessary to establish vegetation in unvegetated, unpaved areas of the site.
 - 1.1 A minimum of 5 inches of topsoil is to be spread on all unvegetated, unpaved areas.
 - 1.2 Unvegetated areas are to be hydroseeded with a mixture perennial and annual rye grasses.
 - 1.3 Coconut matting is to applied to all unvegetated areas to stabilize soils until vegetation is established. Matting is to be secured in accordance with manufacturers specifications.
 - 1.4 Unvegetated areas are to be secured, with fencing to keep pedestrian and vehicular traffic from entering these areas.
- 2 Provided personnel, equipment, materials and services necessary to collect and analyze samples of the soil stockpile located in area formerly operated as a driving school.
 - 2.1 Collect one composite sample of the soil pile. Analyze this sample for: TCLP volatile organics (EPA method 1311, 8260B); TCLP semivolatile organics (EPA method 1311, 8270B); TCLP pesticides (EPA method 1311, 8081 A); TCLP herbicides (EPA method 1311, 8151A); TCLP metals (EPA method 1311, 6010B/7470/7000A series) and total petroleum hydrocarbons(EPA method 8015).
 - 2.2 Collect 5 grab samples of the soil pile. Analyze these samples for polychlorinated biphenyls (EPA method 8082).
 - 2.3 Data generated as for this sampling and analysis shall meet QA1 quality assurance requirements as specified in Quality/Assurance/Quality Control Guidance for Removal Activities (EPA/540/G-90/004).
 - 2.4 Analytical reports for the samples collected are to be provided to EPA for review no later than 30 days after the date of collection.
- 3 Provide personnel, equipment, materials and services necessary to collect and analyze samples of drums located in areas formerly operated as a driving school.
 - 3.1 A minimum of one sample is to be collected of each distinct waste stream.
 - 3.2 At a minimum, the samples are to be analyzed for: TCLP volatile organics (EPA method 1311, 8260B); TCLP semivolatile organics (EPA method 1311, 8270B); TCLP pesticides (EPA method 1311, 8081 A); TCLP herbicides (EPA method 1311, 8151A); TCLP metals (EPA method 1311, 6010B/7470/7000A series); total petroleum hydrocarbons(EPA method 8015); and polychlorinated biphenyls (EPA method 8082). Additional analysis is to performed as necessary to obtain acceptance for disposal.
 - 3.3 Data generated as for this sampling and analysis shall meet QA1 quality assurance requirements as specified in Quality/Assurance/Quality Control Guidance for Removal Activities (EPA/540/G-90/004).

- 3.4 Analytical reports for the samples collected are to be provided to EPA for review no later than 30 days after the date of collection.
- 4 Provide personnel, equipment, materials and services necessary to secure the soil stockpile located in area formerly operated as a driving school..
 - 4.1 The soil pile is to be shaped, so that it is stable, and so that rain water runs off the stockpile and does not collect.
 - 4.2 The soil pile is to be covered with 10-mil polyethylene sheeting. The cover is to be anchored sufficiently to prevent it from being blown off.
- 5 Provide personnel, equipment, materials and services necessary to secure drums staged in the area formerly operated as a driving school.
 - 5.1 Drums are to be staged on polyethylene sheeting surrounded by a hay bale berm.
 - 5.2 Staged drums are to be covered polyethylene sheeting. The cover is to be sufficiently anchored to prevent it from being blown off.
- 6 Provide personnel, equipment, materials and services necessary to repair drainage controls locate down gradient of unvegetated, unpaved areas of the site.
 - 6.1 Inspect down gradient drainage controls and repair or replace as necessary.
- 7 Provide personnel, equipment, materials and services necessary to repair controls instituted to restrict access to areas of known PCB contamination.
 - 7.1 Inspect chain link fence installed and repair or replace as necessary.
 - 7.2 Provide locks to secure gates in chain link fence surrounding restricted access areas.

Work Schedule

- 8 Site work specified in items 1-7 above is to be started no later than 7:30 AM, Monday November 29, 1999 and is to be completed no later 4:00 PM, Friday December 3, 1999 unless otherwise specified.

Developed by: U.S. Environmental Protection Agency
Removal Action Branch
Edison, New Jersey

November 1999

FACSIMILE REQUEST AND COVER SHEET



U.S. Environmental Protection Agency
Quanta Resources Site
103 Wolf Street
Syracuse, NY 13208

TO:

Joe Rotola

FAX:

FROM:

Eric Wilson

OFFICE:

Removal Action Branch

PHONE:

(315) 473-0082

FAX:

(315) 473-0092

DATE:

SUBJECT:

Number of Pages (including cover sheet):

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